

INSTRUCTION NO. ____
CURATIVE “TAINTED ASSOCIATION”

Defendants have the right to introduce evidence such as the emails, letters, and witness testimony on any relevant defense they may have if the Defendants:

- 1) provide the Plaintiff with timely notice of the defense and
- 2) introduce the defense in a manner that does not prejudice Dr. Warren’s rights.

Defendants did not satisfy the requirements for introducing evidence on the negotiations of the Staffing Stipulation in *Little Rock School District v. PCSSD*, 4:1982-cv-00866, or the alleged impact of the Staffing negotiations on Dr. Warren’s consideration for the position of Superintendent, including the Board’s failure to vote for or to hire Dr. Warren. Therefore, that evidence is stricken from the record. You may not consider any of the evidence on the Staffing Stipulation as you decide the issues in this case, including the Board’s intent to discriminate.

